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December 8, 2011

**FILED ELECTRONICALLY**

Honorable Michael A. Shipp  
U.S. Magistrate Judge  
Martin Luther King Jr. Federal Bldg. & Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: Kenwood Appliances Luxembourg, S.A., et al. v. Home Depot U.S.A., Inc., et al.  
Civil Action No. 10-cv-06356 (SRC)(MAS)

Dear Magistrate Judge Shipp:

On behalf of Defendants China Singfun Electric Group Co. Ltd. ("China Singfun") and Kenworld International Company, Ltd. ("Kenworld") and the other parties, I write pursuant to the Court's instruction to submit a joint letter, updating the Court on the current status of discovery in the above-captioned matter. In addition, this will confirm my telephone discussion with your Chambers yesterday, wherein I requested an adjournment of the December 15, 2011 10:30 a.m. telephone status conference, with the consent of all parties.

As to the telephone status conference, I will be out of state in a poor cell phone area on December 15<sup>th</sup>. All the parties are available for a rescheduled status call on December 20<sup>th</sup>, 21<sup>st</sup> in the afternoon, and December 22<sup>nd</sup> before 2 PM. Home Depot's lead counsel, Mr. Potenza, is on vacation the following week.

Consistent with the Pretrial Scheduling Order, the parties served interrogatories and requests for the production of documents in May, 2011. The parties responded to each others interrogatories in June, 2011. Kenworld and China Singfun served amended answers to plaintiffs' interrogatories on November 17, 2011.

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Home Depot initially produced responsive documents to Plaintiff Kenwood Appliances Luxembourg, S.A., ("Kenwood") on June 23, 2011, and supplemented its production on October 28, 2011 to all plaintiffs. In total, Home Depot reports it has produced 13,385 documents, including paper documents, emails, and electronic files. Emails and their attachments have been counted as separate documents. On September 30, 2011, Home Depot provided additional information concerning document requests and interrogatory responses in a letter to Plaintiffs' counsel. China Singfun and Kenworld initially produced their responsive documents in June, 2011 and supplemented their production on November 10, 2011 producing a total of 6,959 pages of documents to date. Plaintiffs' document production was made on June 23, 2011 and Plaintiffs have produced 936 pages of documents. Home Depot served Plaintiffs with additional requests for the production of documents recently, and China Singfun anticipates producing some additional documents as to its costs and expenses in the near future.

To date, depositions of the defendants have been taken as follows: (1) Christian Jessel, Home Depot; (2) Dominic Piccininni, Home Depot; (3) Jerry Ren, China Singfun; and (4) Samantha Yao, China Singfun and on behalf of Kenworld. Defendants China Singfun and Kenworld have noticed the depositions of officers or representatives from Plaintiffs, though these depositions have yet to be scheduled.

The deadline for fact discovery is currently December 15, 2011. The parties respectfully jointly request that the discovery deadline be extended by two months, until February 15, 2012.

Respectfully submitted,

TRENT S. DICKEY

cc: John R. Altieri, Esq. (by e-mail)  
Rudolph V. Pino, Jr., Es. (by e-mail)  
Michael R. Potenza, Esq. (by e-mail)